

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KNIGHT FIRST AMENDMENT INSTITUTE  
AT COLUMBIA UNIVERSITY, *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, *et al.*,

*Defendants.*

No. 17-cv-5205 (NRB)

**MOTION TO WITHDRAW**

Defendants respectfully move for Daniel Halainen to withdraw as counsel in the above-captioned matter, which is currently subject to an appeal to the U.S. Court of Appeals for the Second Circuit. As the attached declaration explains in further detail, Mr. Halainen will be leaving his current position in the Civil Division on September 13, 2019. Michael Baer of the U.S. Department of Justice will continue to serve as counsel of record for the United States.

Dated: September 13, 2019

Respectfully submitted,

/s/ Daniel Halainen

MICHAEL BAER

DANIEL HALAINEN

Trial Attorneys

United States Department of Justice

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*Counsel for Defendants*

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**DECLARATION OF DANIEL HALAINEN**

I, Daniel Halainen, hereby declare as follows:

1. I am an attorney with the U.S. Department of Justice. I respectfully request leave to withdraw my appearance for Defendants in this matter. On September 13, 2019, I will leave my current position at the Department's Civil Division and assume a position at the Environment and Natural Resources Division.

2. The final judgment in this matter currently is subject to an appeal to the U.S. Court of Appeals for the Second Circuit. Michael Baer of the U.S. Department of Justice will continue to serve as counsel of record for Defendants in this Court.

3. I am not retaining or charging a lien.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: Washington, D.C.  
September 13, 2019

By:   
Daniel Halainen

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**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW**

The Court hereby GRANTS Defendants' motion for Daniel Halainen to withdraw as attorney of record for the United States.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Naomi Reice Buchwald  
United States District Judge